

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SJUNDE AP-FONDEN and THE  
CLEVELAND BAKERS AND TEAMSTERS  
PENSION FUND, Individually and on behalf  
of all others similarly situated,

Plaintiffs,

v.

GENERAL ELECTRIC COMPANY,  
JEFFREY R. IMMELT, JEFFREY S.  
BORNSTEIN, JAMIE MILLER, KEITH S.  
SHERIN, JAN R. HAUSER, and RICHARD  
LAXER,

Defendants.

Case No. 1:17-cv-8457-JMF

Hon. Jesse M. Furman

CLASS ACTION

**JOINT STIPULATION AND ~~PROPOSED~~ ORDER**  
**REGARDING PLAINTIFFS' FILING OF A FOURTH AMENDED**  
**CONSOLIDATED CLASS ACTION COMPLAINT**

WHEREAS, on May 29, 2018, the Court appointed Sjunde AP-Fonden as Lead Plaintiff and Kessler Topaz Meltzer & Check, LLP as Lead Counsel for the Class (ECF No. 139);

WHEREAS, on July 23, 2018, Lead Plaintiff and Additional Plaintiff Cleveland Bakers and Teamsters Pension Fund (“Plaintiffs”) timely filed the Third Amended Consolidated Class Action Complaint for Violations of the Federal Securities Laws (the “Complaint”) (ECF No. 153);

WHEREAS, Former Employee 6 (“FE-6”), who provided information that appears in ¶¶ 56, 250-52, 265, 269-70, 279-82, 293, and 295 of the Complaint, has recently contacted Lead Counsel and requested to be removed from the Complaint;

WHEREAS, Lead Counsel intends to amend the Complaint by removing the allegations attributable to FE-6;

to the parties' stipulation and proposed order

WHEREAS, Exhibit A ~~attached hereto~~ is a blackline of the Complaint that reflects all instances in which allegations attributed to FE-6 have been removed;

WHEREAS, Defendants consent to the proposed amendment;

WHEREAS, this amendment to the Complaint will not impact the briefing schedule in effect for filing Plaintiffs’ opposition to Defendants’ Motion to Dismiss the Third Amended Complaint (ECF Nos. 172-74) (the “Opposition”), which is due to be filed on October 12, 2018 (ECF No. 167);

WHEREAS, Defendants request additional time to file their reply to the Opposition (the “Reply”);

WHEREAS, Plaintiffs consent to an extension of time from October 22, 2018, until October 29, 2018, for Defendants to file their Reply.

IT IS HEREBY STIPULATED AND AGREED, by the Parties, through their undersigned counsel, subject to Court approval, as follows:

1. Plaintiffs will promptly file a Fourth Amended Consolidated Class Action Complaint for Violations of the Federal Securities Laws removing allegations in ¶¶ 56, 250-52, 265, 269-70, 279-82, 293, and 295, attributed to FE-6;

2. Defendants agree that the Motion to Dismiss the Third Amended Consolidated Class Action Complaint (ECF Nos. 172-74) (the "Motion") shall apply to the Fourth Amended Consolidated Complaint.

3. Plaintiffs shall file their Opposition to the Motion by October 12, 2018.

4. Defendants shall file their Reply to the Opposition by October 29, 2018.

DATED: October 10, 2018

Respectfully submitted,

**LATHAM & WATKINS LLP**

**KESSLER TOPAZ  
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*Counsel for Lead Plaintiff Sjunde AP-Fonden  
and Lead Counsel for the Class*

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*Counsel for Additional Plaintiff Cleveland Bakers  
and Teamsters Pension Fund and Local Counsel for  
the Class*

SO ORDERED.

DATED: October 12, 2018.

A handwritten signature in black ink, appearing to read "Jesse M. Furman", written over a horizontal line.

HON. JESSE M. FURMAN  
UNITED STATES DISTRICT JUDGE